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FAA-99-5536-224

"A portion of this document from Mr. Joe Black has been determined by the Associate Administrator for Civil Aviation Security, Federal Aviation Administration, to contain Sensitive Security Information (SSI) under the provisions of 14 CFR Part 191. The SSI portion of this comment has been redacted from the document included in this docket. A copy of this comment, including the SSI portion, has been sent to the Federal Aviation Administration, Office of Civil Aviation Security Operations, FAA Security Control Point, for appropriate handling."

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DEPT. OF TRANSPORTATION  
DOCKET SECTION  
June 17, 1999  
99 JUN 18 PM 3:07

U.S. Department of Transportation Dockets  
Docket No. FAA-1999-5336 -  
400 7th Street, SW., Room Plaza 401  
Washington, DC 20590

FAA 99-5536

Dear FAA:

These are my comments on Docket No. FAA- 1999-5336 - 224

I believe the \$2 billion proposed for implementation of the CAPS system is unwarranted for the following reasons.

The ordinary activities of normal Americans are being subjected to an increasing and unjustified level of surveillance. Unfortunately you do not describe in sufficient detail what information from what sources will be aggregated and evaluated in the operation of CAPS to allow me to make an informed evaluation, but it's pretty spooky to think that to fly from one city to another in your own country you must undergo a sort of mini-background check and be subjected to additional security measures because of perfectly normal behavior which should not be regarded as suspicious (perhaps, for example, the use of cash, which used to be thought of as the most honorable way to do business, whereas using credit was considered somewhat suspect).

I hope you will consider the following before spending this money:

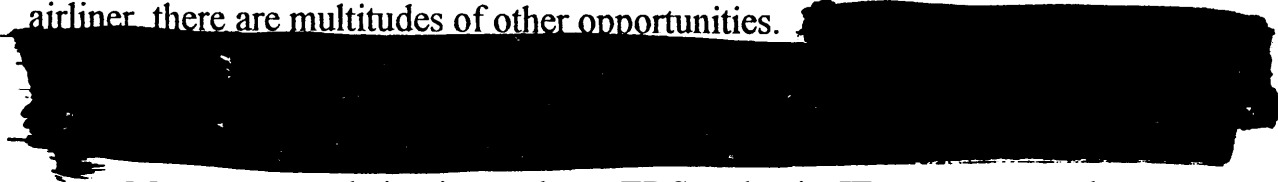
First, it may be that no incidents at all will be prevented and the \$2 billion spent for nought. The commission which made the recommendations was appointed after a crash which turned out not to have been caused by terrorists, and last year there were no major U.S. crashes at all.

Second, it seems to me extremely unlikely that if the CAPS system does prevent airline crashes, it would be more than one or two. If 400 lives were saved, it would come out to \$5 million per life; if 100 lives were saved, \$20 million -- money which could be more efficiently used for other life-saving purposes. It seems to me far more likely that no crashes will be prevented than two or more, so I think my numbers are quite conservative.

As far as the cost of lost business due to a crash, let the airlines do the

calculus and pay for the system if they feel it is cost-effective. When people choose not to fly, it is not a loss to the economy; they spend their money on something else.

Third, CAPS will not deter dedicated terrorists. They may discover (or believe they have) the principles on which CAPS is based, in which case they might be caught, but also might succeed. If they abandon the idea of bringing down an airliner, there are multitudes of other opportunities.



My recommendation is to rely on EDS -- that is, IF we must spend a great deal of money on some new security system. Though it will be some time before it can be used to check all baggage at all airports, some units would go into operation at as many locations as possible as soon as possible. If this system is to be visible to the public, simulated models could be put in place where real ones were unavailable. It would be honestly announced that not all the machines were **functioning** yet but the simulated machines were functioning as a deterrent. The operational models could perhaps be moved **from** one location to another. My knowledge of this system is **confined** to what was printed in the Federal Register, but it would seem that you could do some checking out of public view -- making this widely known, of course -- so that anyone boarding a plane at a facility that had any EDS capability would be risking detection.

Thank you for considering my suggestions.

Sincerely,



Joe Black